

Exhibit 4

DURRETTE, ARKEMA, GERSON & GILL PC
ATTORNEYS AT LAW

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November 11, 2020

VIA FEDERAL EXPRESS AND EMAIL ONLY

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Re: *Mann, et al., v. Princeton Alternative Funding, LLC, et al.*
Civil Action No. 3:20-cv-820-REP
USDC-Eastern District of Virginia-Richmond Division

Dear Counsel:

We represent the following defendants in the above-entitled litigation (the "Litigation"): (i) **Princeton Alternative Funding, LLC** ("PAF"), (ii) **Princeton Alternative Income Fund, L.P.** ("PAIF"), (iii) **Philip N. Burgess, Jr.** ("Burgess"), (iv) **Walter Wojciechowski** ("WW"), (v) **MicroBilt Financial Services Corporation** ("MicroBilt"), (vi) **Alonzo Primus** ("Primus") and (vii) **LJP Consulting, LLC** ("LJP") (collectively, "Clients").

Enclosed, please find a Motion for Sanctions pursuant to Federal Rule of Civil Procedure 11 concerning the propriety of the class action complaint (the "Class Complaint") that you have filed in the Litigation. For the reasons set forth in greater detail in the Motion for Sanctions, we ask that you voluntarily dismiss the Class Complaint within the next 21 days and cease all efforts to further prosecute the Litigation. If you fail to do so and continue with the Class Complaint, our Clients have authorized us to seek sanctions in the amount of all legal fees associated with these Rule 11 efforts as well as any other fees or costs for having to defend this frivolous matter. Accordingly, in order to avoid such consequences, we urge you to withdraw the Class Complaint within the 21-day safe harbor provided by Rule 11(c)(2).

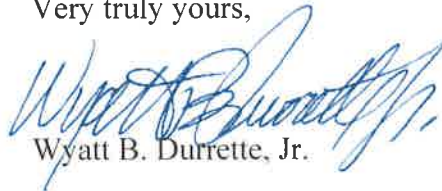
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In addition, because you have used the Class Complaint in an offensive manner in *Williams, et al., v. Microbilt Corp.*, Case No. 3:19-cv-00085-REP (USDC Eastern Virginia-Richmond Division) at ECF Dkt. 170 (Exh. 2), we are further requesting that, in addition to withdrawing the Class Complaint, you further notify Judge Payne that the purpose for which you utilized the Class Complaint is no longer valid and that the Court should not consider the Class Complaint for the jurisdictional purposes for which it was attached as an exhibit.

Be guided accordingly.

Very truly yours,



Wyatt B. Durrette, Jr.

WBDJr/rww
Enclosure.

cc: Maurice R. Mitts, Esquire
Gerard M. McCabe, Esquire